

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

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VISA COMMODITIES AG,

Petitioner,

Civil Action No. 722cv00302

-against-

BLUESTONE COAL SALES CORPORATION,

Respondent.
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**DECLARATION OF
TARA SMITH**

I, Tara Smith, in support of the Verified Petition of Visa Commodities AG (“VCAG”) to recognize, confirm and enforce a foreign arbitral award in favor of VCAG and against Bluestone Coal Sales Corporation (“BCSC”), declare as follows:

1. I am a Legal Director with the London, United Kingdom office of Clyde & Co LLP. At all material times, Clyde & Co LLP was and now is the counsel for VCAG in the underlying arbitration proceedings against BCSC.

2. I submit this Declaration based on facts and information known to me personally, as well as documents and information maintained in the files of Clyde & Co LLP on behalf of VCAG, all of which I believe to be true and accurate.

3. I certify that the attached following documents are true and accurate copies of the original documents:


a) The Settlement Agreement dated April 22, 2021, between BCSC and VCAG.

(Ex. A)

b) The Final Arbitration Award in favor of VCAG issued April 7, 2022. (Ex. B)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 10th day of June, 2022, at London, United Kingdom.

By: 
Tara Smith